

# United States District Court

DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

v.

MAURICE J. HUNT and  
MARCUS S. JAMES

Criminal Complaint

05-115M-MPT

(Name and Address of Defendant)

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about September 30, 2005, in New Castle County, in the District of Delaware defendant(s),

(Track Statutory Language of Offense)

did knowingly conspire with each other to, with intent to defraud, pass and utter counterfeited obligations of the United States, e.g. counterfeit Federal Reserve notes, in violation of 18 U.S.C. § 472, all

in violation of Title 18 United States Code, Section(s) 371

I further state that I am a(n) Special Agent, U.S. Secret Service and that this complaint is based

Official Title

on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: YES

  
Signature of Complainant

Alfonso Lassiter  
Special Agent  
U.S. Secret Service

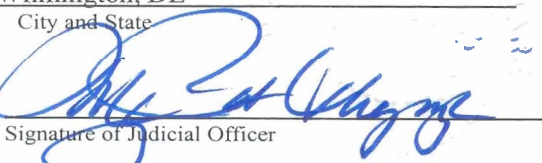


Sworn to before me and subscribed in my presence,

October 3, 2005  
Date

at Wilmington, DE  
City and State

Honorable Mary Pat Thyng  
United States Magistrate Judge  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

**AFFIDAVIT**

I, Al Lassiter, being duly sworn, depose and state:

1. I am a Special Agent in the United States Secret Service. During my employment, I have been trained in the detection and investigation of counterfeit currency, and I have conducted investigations involving counterfeit violations. I am currently assigned to the Wilmington, Delaware Resident Office.

2. On 9/30/05, at approximately 2:00 a.m., the manager of Hak's Sports Bar in Wilmington, Delaware received a counterfeit \$20 FRN from a black male, later identified as Marcus S. James, for entry into the bar for James and another male, later identified as Maurice J. Hunt. James received approximately \$10 in genuine currency in change. Once in the bar, James used another counterfeit \$20 FRN to pay for two drinks, one for himself and one for Hunt. James received approximately \$10 in genuine currency in change.

3. The bartender noticed that the \$20 bill James had used to pay for the drinks was counterfeit. The manager approached James and Hunt and told them that the bill was counterfeit. James gave the manager \$20 in genuine currency. The manager then checked with the door attendant to see how James and Hunt had paid for entry into the club. Upon examining the \$20 bill James had used, the manager realized that that bill also was counterfeit, so he reported the incident to the Delaware State Police. The manager and security at Hak's detained Hunt and James until the police arrived.

4. At approximately 2:10 a.m., a Delaware State Police Trooper responded to Hak's. The manager identified both James and Hunt for the trooper. The trooper patted James and Hunt down for "officer safety and weapons." During the pat down search, the trooper felt what he thought was a weapon at Hunt's waistband. After lifting Hunt's shirt to get the weapon, the trooper realized that what he had felt was a large metal belt buckle, however, he noticed a wad of counterfeit FRN's strapped inside Hunt's waistband. The trooper then arrested both James and Hunt. During a search incident to arrest, the trooper found \$60 in counterfeit FRN's in one of James' shoes.

5. On 09/30/05, your affiant advised Maurice J. Hunt of his *Miranda* rights. After waiving his rights, Hunt admitted to purchasing approximately \$1,500.00 in counterfeit \$20, \$10, and \$5 FRN's for \$400.00 from an unknown black female that he met at a McDonald's Restaurant in New Castle County, Delaware just prior to arriving at Hak's. Hunt admitted giving James approximately \$60.00 in counterfeit to use at Hak's. Hunt also stated that James used the counterfeit to pay for their entry into the club and for drinks.

6. On 09/30/05, your affiant advised Marcus S. James of his *Miranda* rights. After waiving his rights, James stated that he had known Hunt for approximately one month. James stated that he was not aware that the money that Hunt had given him at Hak's was counterfeit until he was confronted by the manager after paying for drinks. James admitted that once he was aware that the money was counterfeit, he hid \$60.00 in counterfeit currency in his shoe.

Based on the information listed above, your affiant respectfully requests the Court to issue a criminal complaint and arrest warrants for Marcus S. James and Maurice J. Hunt for conspiring to violate Title 18, United States Code, Section 472, all in violation of Title 18, United States Code, Section 371.

A handwritten signature in black ink, appearing to read 'Al Lassiter', is written over a horizontal line.

Al Lassiter  
Special Agent  
United States Secret Service